

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:

Michael Lumb,

Debtor.

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)  
) Case No. 21-13216  
)  
) Chapter 13  
)  
) Judge Magdeline D. Coleman  
)  
)

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Finance of America Mortgage LLC f/k/a Finance of America Commercial LLC (“Creditor”) has filed ***Motion for Relief from the Automatic Stay and Abandonment of Property from the Estate*** with the court for i) relief from the automatic stay afforded to the Debtor, Michael Lumb (the “Debtor”) and ii) an order abandoning the Property.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**
2. **If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the Motion, then on or before **02/24/22** **you or your attorney must file a response to the Motion.** (see Instructions on next page).
3. **A hearing on the Motion** is scheduled to be held on **03/08/22, at 10:30 AM in Courtroom No: 2. United States Bankruptcy Court, Robert N.C. Nix Sr. Federal Courthouse, Suite 202, Philadelphia, PA 19107. HEARINGS ARE CONDUCTED BY TELEPHONE 877-336-1828. Access Code 7855846.** Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.
4. **If you do not file a response to the Motion,** the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.
8. **If you are not required to file electronically**, you must file your response at  
  
United States Bankruptcy Court  
Eastern District of Pennsylvania  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107
9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

John J. Berry, Esquire  
Dinsmore & Shohl LLP  
1300 Six PPG Place  
Telephone: (412) 281-5000  
Facsimile: (412) 281-5055  
john.berry@dinsmore.com

Date: February 10, 2022